

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE**

NATHANIEL CLAYBROOKS and
CHRISTOPHER JOHNSON, individually, on
behalf of all others similarly situated,

Plaintiffs

v.

AMERICAN BROADCASTING COMPANIES,
INC., WARNER HORIZON TELEVISION, INC.,
NEXT ENTERTAINMENT, INC., NZK
PRODUCTIONS, INC., and MICHAEL FLEISS

Defendants

CLASS ACTION COMPLAINT

Case No. 3:12-cv-00388

Judge Aleta A. Trauger

**DECLARATION OF MICHAEL FLEISS
FILED IN SUPPORT OF MOTION TO TRANSFER VENUE**

DECLARATION OF MICHAEL FLEISS

I, Michael Fleiss, declare:

1. I am a named defendant in the above-captioned lawsuit. I have personal knowledge of the following facts and, if called and sworn as a witness, could and would competently testify thereto.

2. I am a citizen of the State of California. My permanent residence – at the time the above-captioned lawsuit was filed and currently – is in Los Angeles County, California. I work in Los Angeles and have no present intention to relocate in or out of State.

3. I am the creator of, and an executive producer on, both *The Bachelor* and *The Bachelorette*. I have received the same credits for all 24 seasons of the shows.

4. Next Entertainment, Inc. (“Next”) is my production or loan out company. I am a principal and employee of Next. Next is incorporated in California and based in Los Angeles County, California. Next contracts with NZK Productions, Inc. for my artistic services.

5. My involvement in the casting process is very limited. I generally do not participate to any meaningful degree in the casting of the suitor roles. I have some limited involvement in recommending the title character to the network, but this is usually limited to participating in general, informal discussions with the executive producers and network executives (e.g., this suitor might be a good bachelor or bachelorette) and then meeting the finalist (before he or she is recommended to the network). These communications and meetings have generally taken place in Los Angeles County, California – but it is possible one or more

took place during production in other cities or countries (e.g., Paris, France for season 8).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 22nd day of June, 2012, in Los Angeles, California.


Michael Fleiss